

Begin forwarded message:

**From:** Am t For t <[REDACTED]>  
**Date:** Apr 26, 2022 at 09:03:37 EDT  
**To:** [REDACTED]  
**Subject:** Fwd: Insight Analysis and Research LLC and SDC-Gadot LLC

התחל הודעה מועברת:

**מאת:** <Am t For t [REDACTED]>  
**תאריך:** 26 באפריל 2022 בשעה 08:19:34 GMT+3  
**אל:** [REDACTED]  
**נושא:** הועבר: Insight Analysis and Research LLC and SDC-Gadot LLC

התחל הודעה מועברת:

**מאת:** <Sh mon [REDACTED]>  
**תאריך:** 26 באפריל 2022 בשעה 03:49:37 GMT+3  
**עוֹתֵק:** [REDACTED]  
**נושא:** הועבר: Insight Analysis and Research LLC and SDC-Gadot LLC

Dear Mr For t

I am send ng th s as your reg stered agent for your US corporat ons. My prev ous ema came back returned. I m staken y put the address ncorrect y. I wrote ".com" nstead of ".co"

P ease see the attached regard ng the awsu t fied aga nst ns ght ana ys s and SDC-Gadot. P ease et me know f you'd ke me to share your ema w th the other attorneys so they may contact you d rect y.

Regards

Sh mon Go dberger  
SRSL Management Inc  
3200 Co ns Ave  
M am Beach, FL 33140

Sent from my Phone p ease excuse any typograph ca errors.

Begin forwarded message:

**From:** "Herbert, Ian" <[REDACTED]>  
**Date:** Apr 7, 2022 at 3:23:54 PM EDT  
**To:** [REDACTED]  
**Cc:** "Lee, Ca v n" <[REDACTED]>  
**Subject:** Insight Analysis and Research LLC and SDC-Gadot LLC

Dear Mr. Go dberger,

We represent Farhad Az ma n the UK awsu t sty ed *Farhad Azima -v- (1) RAKIA (2) David Neil Gerrard (3) Dechert LLP and (4) James Edward Deniston Buchanan* (C a m Number HC-2016-002798). Thank you for tak ng the t me to ta k w th me and my co eague, Ca v n Lee, regard ng the subpoenas you rece ved for Ins ght Ana ys s and Research LLC ("Ins ght") and SDC-Gadot LLC ("Gadot"). To prevent m sunderstand ngs ater, we wr te to memor a ze our conversat on and fo ow up on the tems we d scussed.

In response to our service of the subpoenas, you explained that you needed to refresh your recollection about these companies, since you initially did not recall agreeing to serve as the registered agent. After doing so, you recalled that in 2017, your CPA Arthur Propst asked you to serve as the registered agent for several companies, including Insight and Gadot, and you agreed to do so. All of the companies for which you serve as registered agent were set up by Mr. Propst. Though you agreed to serve as registered agent, you had not been paid prior to receiving the above-reference subpoenas. However, after you were served with the subpoenas, Insight and Gadot paid all outstanding fees, and you have now confirmed that you are the registered agent for both companies.

You also confirmed that you provided the subpoenas to Mr. Propst and the authorized representatives for Insight (Aaron Amr Guravie) and Gadot (Amit Forti). As I mentioned on the call, the court also authorized us to issue a subpoena for depositions, which are attached to this email. You said that you would accept service of the deposition subpoenas by email. We are seeking the 30(b)(6) depositions of Insight and Gadot, and a deposition of Mr. Forti in Miami the week of May 2, 2022.

Please confirm that you accept service of these additional subpoenas and will provide them to the authorized representatives. Please also let me know if my understanding of the facts as described above is incorrect in any way.

Kind regards,

Ian

**IAN A. HERBERT**

Counsel at He/him/his | Miller & Chevalier Chartered

900 16th Street NW | Black Lives Matter Plaza | Washington, DC 20006

[REDACTED] | 202.626.1496 | [REDACTED]

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This electronic message contains information which may be legally confidential and/or privileged. The information is intended solely for the individual or entity named above and access by anyone else is unauthorized. If you are not the intended recipient, any disclosure, copying, distribution, or use of the contents of this information is prohibited and may be unlawful. If you have received this electronic transmission in error, please reply immediately to the sender that you have received the message in error, and delete it. Thank you.



Notice of  
Deposi...ght.pdf



Notice of  
Deposi...dot.pdf



Notice of  
Deposi...rlit.pdf

**N THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION**

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*In re:* Application Pursuant to  
28 U.S.C. § 1782 of

FARHAD AZIMA

Petitioner,

v.

INSIGHT ANALYSIS AND RESEARCH  
LLC AND SDC-GADOT LLC

Respondents,

---

No. 22-20707-MC-MARTINEZ

**NOTICE OF DEPOSITION**

Please take notice that pursuant to Federal Rule of Civil Procedure 30 and Local Rule 26.1(h) on May 4, 2022, commencing at 10:00 AM, counsel for Petitioner, Farhad Azima, (“Azima”) will take the deposition of Amit Forlit c/o Insight Research Analysis LLC and SDC-Gadot LLC at Carlton Fields, P.A., 700 NW 1st Avenue, Suite 1200, Miami FL 33136, or at such other time, date and place as may subsequently be agreed upon by parties. The deposition shall be taken before a person authorized to administer oaths and will be recorded by sound, video and/or stenographic means. The deposition will continue from day to day between the hours of 10:00 AM and 5:00 PM until completed. The deposition will be used for purposes of *Farhad Azima -v- (1) RAKIA (2) David Neil Gerrard (3) Dechert LLP and (4) James Edward Deniston Buchanan* (Claim Number: HC-2016-002798), as described in the Application for Order to Take Discovery Pursuant to 28 U.S.C. Section 1782. ECF No. 1.

Respectfully submitted,

Dated: April 7, 2022

/s/ Michael S. Pasano

Michael S. Pasano (FBN 475947)

Email: [MPasano@carltonfields.com](mailto:MPasano@carltonfields.com)

Vanessa Singh Johannes (FBN 1028744)

E-mail: [VJohannes@carltonfields.com](mailto:VJohannes@carltonfields.com)

CARLTON FIELDS P.A.

700 N.W. 1st Avenue, Suite 1200

Miami, Florida 33136-4118

Telephone: (305) 530-0050

/s/ Kirby D. Behre

Kirby D. Behre (admitted *pro hac vice*)

MILLER & CHEVALIER CHARTERED

900 16<sup>th</sup> Street, NW

Washington, D.C. 20006

Telephone: (202) 626-5800

Fax: (202) 626-5801

Email: [kbehre@milchev.com](mailto:kbehre@milchev.com)

*Counsel for Petitioner*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 7, 2022, I caused a true and correct copy of the Notice of Deposition will be sent via e-mail to the following addresses:

INSIGHT ANALYSIS AND RESEARCH LLC

13727 SW 152 Street #715

Miami, Florida 33177

c/o Shimon Goldberg

Manager's Office

3200 Collins Ave.

Miami Beach, FL 33140

[shimon@srsmanagement.com](mailto:shimon@srsmanagement.com)

SDC-GADOT LLC

3200 Collins Ave.

Suite L2

Miami Beach, Florida 33140

c/o Shimon Goldberg

Manager's Office

3200 Collins Ave.

Miami Beach, FL 33140

[shimon@srsmanagement.com](mailto:shimon@srsmanagement.com)

/s/ Michael S. Pasano

Michael S. Pasano

## UNITED STATES DISTRICT COURT

for the

Southern District of Florida

Farhad Azima

*Plaintiff*

v.

Insight Analysis & Research LLC and  
SDC-GADOT LLC*Defendant*

Civil Action No. 22-20707-MC-Martinez

## SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To:

Amit Forlit

c/o Shimon Goldberger, 3200 Collins Avenue c/o Manager's Office, Miami Beach, FL 33140

*(Name of person to whom this subpoena is directed)*

☒ **Testimony:** YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization, you must promptly confer in good faith with the party serving this subpoena about the following matters, or those set forth in an attachment, and you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about these matters:

Place: Carlton Fields, P.A. 700 NW 1st Avenue, Suite 1200, Miami, FL 33136-4118	Date and Time: 05/04/2022 10:00 am
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The deposition will be recorded by this method: video deposition

- ☐ **Production:** You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 04/07/2022

CLERK OF COURT

OR

/s/ Michael S. Pasano

*Signature of Clerk or Deputy Clerk**Attorney's signature*

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* \_\_\_\_\_  
Petitioner, Farhad Azima, \_\_\_\_\_, who issues or requests this subpoena, are:

Michael S. Pasano, Carlton Fields, 2 MiamiCentral, 700 NW 1st Ave., Ste. 1200, Miami, FL 33136; 305.530.0050;  
mpasano@carltonfields.com

**Notice to the person who issues or requests this subpoena**

If this subpoena commands the production of documents, electronically stored information, or tangible things before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 22-20707-MC-Martinez

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

I received this subpoena for *(name of individual and title, if any)* \_\_\_\_\_  
on *(date)* \_\_\_\_\_ .

☐ I served the subpoena by delivering a copy to the named individual as follows: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

☐ I returned the subpoena unexecuted because: \_\_\_\_\_  
\_\_\_\_\_ .

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also  
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of  
\$ \_\_\_\_\_ .

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ 0.00 .

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_  
\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc.:

**Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)****(c) Place of Compliance.**

**(1) For a Trial, Hearing, or Deposition.** A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
  - (ii) is commanded to attend a trial and would not incur substantial expense.

**(2) For Other Discovery.** A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

**(d) Protecting a Person Subject to a Subpoena; Enforcement.**

**(1) Avoiding Undue Burden or Expense; Sanctions.** A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

**(2) Command to Produce Materials or Permit Inspection.**

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

**(3) Quashing or Modifying a Subpoena.**

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

**(e) Duties in Responding to a Subpoena.**

**(1) Producing Documents or Electronically Stored Information.** These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

**(2) Claiming Privilege or Protection.**

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

**(g) Contempt.**

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.